

**REMARKS**

Claims 1-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Phipps (U.S. Patent No. 6,579,231) in view of Cheng (WO 00/39964). In effort to further prosecution, Applicants presently amend claims 1, 8 and 15 to clearly distinguish the first domain and the second domain, as claimed, from the cited art. Applicants submit that the amendments are fully supported in the specification, for example, at page 76, lines 1-23, and Figure 13, elements 912 and 914, and the amendments add no new subject matter to the present application. Applicants also submit that the amendments and these remarks overcome all of the outstanding rejections and that the present Application is in condition for allowance. Therefore, Applicants respectfully request a notice of allowance of all the claims.

**Claim Rejections – 35 U.S.C. § 103**

The proposed combination of Phipps and Cheng cannot be used to establish a prima facie case of obviousness under 35 U.S.C. § 103 because the proposed combination does not teach or suggest at least the following elements of the claims of the present application: “transmitting the domain state object from the first domain to a second domain that also includes a plurality of network-connected devices, at least one of the devices in the second domain administered to alter the user’s environment in the second domain in dependence upon the information describing the state of the devices in the first domain.”

**The Combination Of Phipps And Cheng  
Does Not Teach Or Suggest  
Transmitting The Domain State Object  
From The First Domain To A Second Domain**

The Office Action takes the position that Phipps at Figure 1, abstract, column 2, lines 34-40, column 3, lines 32-43, column 3, line 66 to column 4, line 5, and column 4, lines 45-52, discloses “transmitting the domain state object from the first domain to a second domain that also includes a plurality of network-connected devices, at least one of the devices in the second domain administered to alter the user’s environment in the second

domain in dependence upon the information describing the state of the devices in the first domain." What Phipps at the abstract in fact discloses is "a portable unit worn by a subject, comprising a medical monitoring device, a data processing module with memory and transmitter for collecting, monitoring, and storing the subject's physiological data and also issuing the subject's medical alarm conditions via wireless communications network to the appropriate location for expeditious dispatch of assistance." That is, Phipps teaches a portable medical device that collects and locally stores a subject's physiological data. The portable medical device is capable of placing distress calls, such as a 911 telephone call, using an integrated cellular telephone or two-way pager in situations where the subject is unable to respond to an alarm condition in the portable medical device. Phipps, however, does not teach or suggest, for several reasons, transmitting a domain state object from a first domain to a second domain such that at least one of the devices in the second domain is administered to alter the user's environment in the second domain in dependence upon the information describing the state of the devices in the first domain, as claimed in the present application.

One reason Phipps does not teach or suggest transmitting a domain state object from a first domain to a second domain, as claimed here, is because Phipps' portable medical device does not transmit anything from one domain to another domain. Claim 1, as presently amended, recites "a first domain comprising a first networked environment including a plurality of network-connected devices" and "a second domain comprising a second networked environment including a plurality of network devices." That is, a domain, as claimed in the present application, is a particular networked environment. Claim 1 recites transmitting a domain state object from a first domain to a second domain. That is, the domain state object is transmitted from one particular network environment to another particular network environment. Phipps, in contrast, does not teach or suggest transmitting from one particular network environment to another particular network environment. The only teaching in Phipps that could be construed as a network environment would be the cellular telephone or paging network over which Phipps' portable medical device is capable of placing distress calls. Phipps, however, merely teaches transmitting from one device on a network, such as Phipps' portable

medical device, to another device *on the same network*, such as a telephone or a pager at a 911 emergency response center. Nothing in Phipps discloses two distinct domains, each domain including a plurality of networked devices, where a domain state object is transmitted from one domain to the other domain, as claimed here. Because Phipps does not disclose multiple domains, Phipps cannot possibly disclose transmitting the domain state object from the first domain to a second domain that also includes a plurality of network-connected devices, at least one of the devices in the second domain administered in dependence upon the information describing the state of the devices in the first domain as claimed in the present application.

Another reason Phipps does not disclose transmitting a domain state object from a first domain to a second domain, as claimed here, is because Phipps' portable medical device does not transmit a domain state object. A domain state object includes a metric vector, a metric space and a device state object. *See Applicants' specification*, for example, at page 45, lines 6-8 and Figure 3, elements 606, 610, 914, and 926. The domain state object is what gets transmitted in the present application. Phipps, in contrast, merely teaches placing an emergency phone call or sending a page to a 911 emergency response center if the subject is unable to response to an alarm condition in Phipps' portable medical device. Neither Phipps' phone call nor Phipps' page teaches or suggests transmitting a domain state object as claimed here because there is no teaching in Phipps that the phone call or page includes transmitting a domain state object. That is, there is no teaching that Phipps' emergency phone call or page includes transmitting a metric vector, a metric space and a device state object, as claimed here. Nothing in Phipps teaches or suggests transmitting a domain state object from one domain to the other as claimed in the present application. Because Phipps does not teach or suggest transmitting a domain state object, Phipps cannot possibly teach or suggest transmitting the domain state object from the first domain to a second domain that also includes a plurality of network-connected devices, at least one of the devices in the second domain administered in dependence upon the information describing the state of the devices in the first domain as claimed in the present application.

The Office Action at page 4 admits that Phipps does not disclose "at least one of the devices in the second domain administered to alter the user's environment in the second domain in dependence upon the information describing the state of the devices in the first domain." The Office Action takes the position that Cheng provides the teaching missing in Phipps. What Cheng actually discloses, however, is a home automation system comprising devices and modules that are "interconnected via a home network". The devices and modules can "exchange control and data in a peer-to-peer fashion" or a logical master or controller can "impose a control structure on the basic peer-to-peer communication model." That is, Cheng teaches devices on a single network that can control each other or alternatively be controlled by a master device on the same network.

Cheng does not teach or suggest "at least one of the devices in the second domain administered to alter the user's environment in the second domain in dependence upon the information describing the state of the devices in the first domain" because Cheng's home automation system does not teach or suggest devices in more than one domain. Claim 1, as presently amended, recites "a first domain comprising a first networked environment including a plurality of network-connected devices" and "a second domain comprising a second networked environment including a plurality of network devices." That is, a domain in the present application is a particular networked environment. According to the claims of the present application, a device in one domain alters the user's environment in that domain based upon information describing the state of devices in another domain. Cheng's home automation system, in contrast, comprises a single network including a number of devices. That is, Cheng teaches devices in only one domain. Because Cheng does not teach or suggest devices in more than one domain, Cheng cannot possibly teach or suggest a device in a second domain administered in dependence upon information describing the state of devices in a first domain. Because Cheng does not teach or suggest devices in more than one domain, the proposed combination of Phipps and Cheng cannot possibly teach or suggest at least one of the devices in the second domain administered to alter the user's environment in the second domain in dependence upon the information describing the state of the devices in the first domain, as claimed in the present application. Because the proposed combination of

Phipps and Cheng does not teach or suggest each and every element of Applicants' claims, the proposed combination does not establish a prima facie case of obviousness and the rejections under 35 U.S.C. § 103 should be withdrawn.

### CONCLUSION

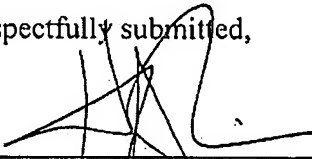
Because the combination of Phipps and Cheng does not teach or suggest each and every element of the claims, the combination cannot be used to establish a prima facie case of obviousness against claims 1-21 of the present application. The rejection of claims 1-21 under 35 U.S.C. § 103 should therefore be withdrawn and claims 1-21 should be allowed. Applicants respectfully request reconsideration of claims 1-21 of the present application.

The Commissioner is hereby authorized to charge or credit Deposit Account No. 09-0447 for any fees required or overpaid.

Respectfully submitted,

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